

**REMARKS**

Claims 1-6 are pending in this application. Claim 1 is amended in this Reply.

Claims 1-6 are pending in this application. Claim 1 is the only independent claim.

By this amendment, claim 1 is amended for clarity.

Reconsideration in view of the above amendments and following remarks is respectfully solicited.

**The Claims Define Patentable Subject Matter**

The Final Office Action maintains the previous rejections and continues to indicate that:

(1) claims 1-5 are rejected under 35 U.S.C. §103(a) as being unpatentable over European Patent No. EP 0 949 571 A2 by Bickmore (hereafter Bickmore) in view of International Publication No. WO 00/39666 by Carlino et al. (hereafter Carlino); and

(2) claim 6 is rejected under 35 U.S.C. §103(a) as being unpatentable over Bickmore in view of Carlino and further in view of Nokia 5110 telephone User's Guide.

These rejections are respectfully traversed.

In response to applicant's previous arguments the Examiner makes the following comments:

Firstly, the Examiner states that the claim language does not read that it makes it easier to find a desired link nor that the links are limited from images. (see final Office Action, page 4) Applicant respectfully disagrees with the Examiner's response.

For example, applicant submits that the statement made in our previous Reply regarding "it makes it easier to find a desired link" is merely a statement of the benefit of the claimed invention. A benefit applicant believes is missing from Bickmore. Furthermore, the Examiner states that the links extracted does not exclude links from images. (restated for clarity) .

For instance, applicant previously argued that Bickmore only extracts links from images and not from the entire document, as such some links fail to be extracted. The Examiner appears to be asserting that the claims do not make it clear that all links, above and beyond the image links, are extracted. Applicant respectfully disagrees with this assertion.

For example, Claim 1 specifically recites, *inter alia*, that a link extraction section extracts the plurality of units of link information in a hypertext document. Applicant submits that this statement suggests that all links are extracted in the document. However, to amplify this point, and to expedite prosecution, applicant amended claim 1 to recite “*a link extraction section for extracting each of the plurality of units of link information from the hyper text document.*” Such an amendment would help in clarifying that all link information is intended to be extracted.

In contrast with extracting all link information, Bickmore merely extracts links only from the images removed in a document.

Secondly, applicant previously argued that Bickmore fails to disclose a plurality of groups of links. Specifically, in the claimed invention, a link information classification section classifies the plurality of units of link information into a plurality of groups so that each group includes a prescribed number of units of link information.

In response to this argument, the Examiner states that Bickmore discloses on page 7, paragraph 53 that the invention extracts links and reformats them into “a text list of link anchors.” The Examiner goes on to say that this is interpreted as the cited limitation because the links are grouped by section. (see final Office Action, page 4). Applicant respectfully disagrees with this statement.

For instance, Bickmore fails to disclose that the links are grouped in sections as alleged by the Examiner. Bickmore merely discloses that the document 100 is converted into a list of sections... and each section header 104 is converted into a hypertext link. (see Bickmore, page 6, paragraph [0044]; Fig. 1).

In other words, Bickmore fails to classify the “extracted links” (from the images) into a plurality of groups, as claimed. Bickmore merely formats the extracted hypertext image links into a single text list of link anchors, instead of a plurality of groups each having a prescribed

number of links. As such, applicant respectfully submits that the Examiner has failed to show where/how Bickmore classifies the extracted links into a plurality of groups.

Thirdly, applicant previously argued that Bickmore fails to disclose assigning a code to each of the prescribed number of units of link information included in the specific group. In response to this argument, the Examiner states that Bickmore's labeling parse tree nodes with a unique identifier is interpreted as the code being assigned to the links and being different from each other. Applicant respectfully disagrees with this statement. (see final Office Action, page 5).

For example, applicant submits that Bickmore's labeling of each parse tree node with a unique identifier has nothing to do with assigning a code to each hypertext link extracted, as set forth in the present invention. Bickmore is merely describing an internal software process that is performed on the HTML document as a whole, not an assignment of codes to extracted links. Furthermore, these "unique identifiers" of Bickmore fail to be directly related to the extracted links and they fail to be visible to the user. As such, a user in Bickmore would not be able to input the "unique identifiers" because these identifiers are never disclosed to the user.

In the present invention, an input section is used to input each code. The claimed invention goes on to recite that "the code is input through the input section while the list of the prescribed number of units of link information included in the specific group is displayed." In other words, in the present invention, while a specific group of links is being displayed with the assigned codes, a desired code is input by the user. Bickmore fails to teach this feature. Bickmore merely internally labels each of the parse tree nodes with a unique identifier, but this unique identifier fails to be displayed so that a user can input a desired identifier.

Fourthly, applicant previously argued that Bickmore fails to disclose an input section as claimed. In response to this argument, the Examiner states that Bickmore's inputting of unique identifiers constitutes the input section. (see final Office Action, page 5). Applicant disagrees with this statement.

For at least the reasons noted above regarding the assignment of a code to each link information, applicant submit that Bickmore also fails to disclose an input section that allows a user to input a desired code while the specific group of links is being displayed. Stated again, Bickmore fails to display its unique identifiers, therefore, such identifiers cannot be inputted if they cannot be seen.

Fifthly, in response to applicant previous arguments that Bickmore fails to disclose displaying the specific group of link information, the Examiner states that ...Bickmore discloses displaying on the browser of a thin client. Applicant submits that Bickmore merely discloses that the re-authored reduced page 410 is displayed on a browser window 420. However, Bickmore fails to disclose displaying the list of the prescribed number of units of link information included in a specific group, as set forth in claim 1.

Sixthly, in response to our previous arguments that Carlino fails to disclose the “plurality of groups of links” and that Bickmore fails to disclose the limitation of claim 3 wherein “a button bearing the respective code assigned is included in the input section”, the Examiner states Carlino is relied upon for the classifying of link information into a plurality of groups. However, Carlino merely discloses organizing the entire document into categories such as text, links and tables. In other words, Carlino merely discloses a plurality of categories for the document contents. However, Carlino fails to disclose a “plurality of groups” for the “extracted link information”.

As shown in Carlino’s Fig. 7, a single group, entitled “LINKS”, not a plurality of groups is being used for the “extracted links”. It appears that the Examiner is confusing “plurality of categories” with the “plurality of groups for extracted links”. In Carlino, only the single group called “LINKS” includes link information. In contrast, in the present invention, a plurality of groups has link information contained therein.

Furthermore, a close review of both Bickmore and Carlino reveal that both Bickmore and Carlino fail to display a list of the prescribed number of units of link information included in a specific group, because both Bickmore and Carlino fail to provide a plurality of groups of links.

Bickmore merely takes an original document and converts it into a list of sections. As such, Bickmore's list in Fig. 1 is a list of sections found in the document, not a list of link information extracted from the document. Then, each section header in Bickmore's document is converted into a hypertext link to the original text block. (see Bickmore, paragraphs [0044-0045], and Fig. 1).

In other words, Bickmore takes the different sections in the document and puts them into a list, then the section headers are converted to hypertext links to the original document. As such, Bickmore's links are a result of a conversion being performed, instead of being extracted links. Bickmore fails to take link information extracted from the document and place them into a plurality of groups containing a specified number of links and display a specific group, as set forth in claim 1. Instead, Bickmore takes text information and converts it into link information. As such, Bickmore involves a great deal of conversion to arrive at link information. The only "extracted" link information in Bickmore is the link information extracted from removed images.

Applicant respectfully submits that the Examiner is improperly interpreting Bickmore and Carlino. Furthermore, it appears that the Examiner is relying heavily upon Bickmore's software (methods) manipulations to read upon the claimed individual structural components, i.e., display section, input section.

In U.S. Patent law, an apparatus must be distinguished from the prior art in terms of structure rather than function, as in accordance with M.P.E.P. §2114. In other words, an apparatus claim covers what a device *is*, not what a device does. *Hewlett-Packard Co. v. Bausch & Lomb Inc.*, 909 F.2d 1464, 1469, 15 USPQ2d 1525, 1528 (Fed. Cir. 1990).

Applicant submits that the Examiner has failed to show how the cited references disclose the claimed device. Furthermore, applicant disagrees with the Examiner's interpretation of Bickmore. As noted above, applicant submits that Bickmore fails to teach or suggest the claimed sections of the hypertext display apparatus and fails to be concerned with organizing the plurality of hypertext links within a document.

Applicant also submits that the Nokia 5110 User's Guide fails to make up for the deficiencies found in both Bickmore and Carlino noted above.

As such, applicant submits that the claimed invention is distinguishable from the combination of cited art, Bickmore, Carlino and Nokia for at least the reasons noted above.

To establish a *prima facie* case of Obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP 706.02(j).

Applicant respectfully submits that the combination of cited references fail to teach or suggest each and every feature as set forth in the claimed invention.

Applicant respectfully submits that independent claim 1 is allowable over the cited art for at least the reasons noted above.

As for each of the dependent claims not particularly discussed above, these claims are also allowable for at least the reasons set forth above regarding their corresponding independent claims, and/or for the further features claimed therein.

Accordingly, withdrawal of the rejection of claims 1-6 under 35 U.S.C. §103(a) is respectfully requested.

### Conclusion

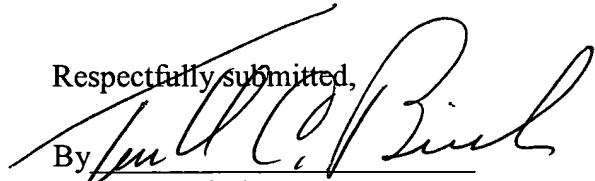
In view of the foregoing, Applicant respectfully submits that the application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact Carolyn T. Baumgardner (Reg. No. 41,345) at (703) 205-8000 **to schedule a Personal Interview.**

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment from or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §1.16 or under 37 C.F.R. §1.17; particularly, the extension of time fees.

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Respectfully submitted,



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